



**Office of the
Special Narcotics Prosecutor
for the City of New York**

Bridget G. Brennan, Special Narcotics Prosecutor

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March 29, 2021

BY ELECTRONIC DISCOVERY

Dear Counsel:

This disclosure letter concerns Detective Jason Miller, Shield #02120 of the New York City Police Department ("the Department"), presently assigned to NARCBMS, whom the People intend to call as a witness in this case. In addition to the information below, police disciplinary information exists in various formats online, including in a database located at: <https://www.nyclu.org/en/campaigns/Nypd-misconduct-database>. Information concerning Detective Miller may or may not be included in this database, and the People are unable to verify the database's general accuracy.

Pursuant to People v. Garrett, 23 N.Y.3d 878 (2014), the People are disclosing the following list of civil lawsuits in which Detective Miller has been named in his capacity as a member of law enforcement.

The People identified the lawsuits listed below primarily using public databases and information, including a list of lawsuits alleging misconduct by the NYPD and its individual officers which is published every six months on the New York City Law Department's web site, available at <https://www1.nyc.gov/site/law/public-resources/nyc-administrative-code-7-114.page>. Publicly-available litigation materials related to these lawsuits are also being provided, to the extent the materials currently are in the People's possession.

Case Name: *BROWN, VERNON VS NEW YORK CITY, ET AL.*

Case Number: 113415/2010; Court: Supreme Court - New York; Litigation Start Date: October 13, 2010

Case Name: *GONZALEZ, EDWIN VS CITY OF NEW YORK, ET AL.*

Case Number: 156119/2016; Court: Supreme Court - New York; Litigation Start Date: November 16, 2016

Case Name: *LJUTIC, VICTORIA VS CITY OF NEW YORK, ET AL.*

Case Number: 17CV07169; Court: U.S. District Court - Eastern District NY; Litigation Start Date: December 12, 2017

Case Name: *MINUS, OMAR VS HOWARD, EDWARD, ET AL.*

Case Number: 12CV09464; Court: U.S. District Court - Southern District NY; Litigation Start Date: April 24, 2013

Case Name: *MINUS, OMAR VS HOWARD, EDWARD, ET AL.*

Case Number: 17CV04827; Court: U.S. District Court - Southern District NY; Litigation Start Date: August 18, 2017

Case Name: *NELSON, TYSON VS CITY OF NEW YORK, ET AL.*

Case Number: 16CV00234; Court: U.S. District Court - Southern District NY; Litigation Start Date: January 20, 2016

Case Name: *RANSOM, ANTHONY VS MILLER, JASON, ET AL.*

Case Number: 15CV10028; Court: U.S. District Court - Southern District NY; Litigation Start Date: December 23, 2015

Case Name: *STUART, WAYNE VS CITY OF NEW YORK*

Case Number: 109967/2011; Court: Supreme Court - New York6; Litigation Start Date: December 02, 2011

Case Name: *ZICHETTELO, JOHN VS CITY OF NEW YORK, ET AL.*

Case Number: 17CV07149; Court: U.S. District Court - Eastern District NY; Litigation Start Date: December 12, 2017

Allegations of misconduct that have not been substantiated and are not pending (including, but not limited to, findings of unsubstantiated, unfounded, and exonerated) are not subject to disclosure and generally are not included in this letter. Additionally, the decision to include information in this letter does not represent a conclusion by the People that all the information contained herein is required to be disclosed under the People's constitutional, ethical or statutory obligations. The People reserve the right to move in limine to preclude or limit reference to the information in this letter in any further proceedings in this prosecution.

If you have any questions, feel free to contact me at (212) 815-0414.

Sincerely,

Lauren Di Giovanni

Assistant District Attorney